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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE:

SUBJECT: **ACTION MEMORANDUM:** Authorization to Extend the Period of Performance for the completion of the Supplemental Groundwater Investigation for the residents living east and southeast of the Himco Dump Superfund Site, located in Elkhart, Indiana

FROM: William E. Muno, Director
Superfund Division

TO: Thomas V. Skinner
Regional Administrator

Purpose:

The purpose of this Action Memorandum is to support the need for an extension to the period of performance for the Interagency Agreement (IAG) # DW96947722-01-7 with the U.S. Army Corps of Engineers (USACE) for the completion of the Supplemental Investigation for the Himco Dump Superfund Site.

Background/Current Status:

The Himco Dump site is a closed 48-acre landfill, located at County Road 10 and the Nappanee Street Extension in Cleveland Township, adjacent to the City of Elkhart, Elkhart County, Indiana. The site is located approximately two miles north of the St. Joseph River which runs east-west through the City of Elkhart.

The landfill area is covered with a layer of sand, under which is a layer of white, powdery, calcium sulfate. The western half of the landfill cover is vegetated with grasses; the eastern half with grasses, bushes, and young trees. The construction debris area (CDA), located south of the landfill and north of County Road 10, contains many small piles of rubble, concrete, asphalt, and metal debris.

A Record of Decision (ROD), signed on September 30, 1993, specified the following:

-Construction of a composite barrier, solid waste landfill cover (cap) over the landfill proper and the CDA;
-Use of institutional controls on landfill property to limit land and groundwater use;
-Installation of an active landfill gas collection system including a vapor phase carbon system to treat the off-gas from the landfill. An enclosed ground flare system will be implemented if landfill gas characterization studies indicate VOC emissions exceed ARARs (Indiana Administrative Code 326 IAC); and,

-Monitoring of groundwater to ensure effectiveness of the remedial action and to evaluate the need for future groundwater treatment.

The analyzed results in the CDA of the 1998 ground water sampling reported ground water contaminated at levels greater than the Safe Drinking Water Act, 42 U.S.C. §§ 300F-300j-11, maximum contaminant level(MCL)s for groundwater. The contaminant found in exceedence of the MCLs were metals and a semi-volatile, antimony, arsenic, manganese, and bis(2-ethylhexyl)phthalate respectively.

The 1998 investigation also included collection and analysis of soil gas samples at the perimeter and beyond the perimeter of the landfill. The 1998 CDA soil gas samples collected and analyzed detected vinyl chloride, total chlorinated ethane, total chlorinated ethene, and BTEX gases migrating off the landfill. The analyzed data of the migrating gases also showed the detected gases moving beyond the perimeter of the landfill in a direction towards the proximity of potential human receptors not previously anticipated.

The extension of the period of performance is intended to complete the supplemental investigation report of the ground water data collected during 1999 and 2000 from the residents living east and southeast of the landfill.

The ROD signed in Sept. 1993 specified the use of institutional controls on the landfill property to limit land and ground water use. The Alternative Analysis Study will address different scenarios for unlimited land use. The construction of a composite barrier over the landfill will remain as in the original ROD however, this composite barrier does not need to include the CDA, as included in the original 1993 ROD. The results of all analysis will be combined with data from the RI (as appropriate) and run through a revised risk evaluation. The results will either provide a basis for a ROD amendment or an ESD.

The cancer slope factors and risk assessment policies implemented subsequent to the original risk assessment suggest the original 1992 baseline risk assessment (BRA) may have over estimated risks at the site, hence the risk assessment needs to be re-evaluated before proceeding with remedial actions.

Estimated Project Cost and Schedule:

To date, U.S.EPA Region 5 has allocated a total of $1,324,142.00 for the pre-design studies to support a remedial design to place a multi-layer geocomposite/geosynthetic cover system with an active landfill gas collection and treatment system, including a site operations, maintenance and monitoring plan. In addition, these funds paid for supplemental site investigation work, reassessment of risk and residual remedial design work for the Construction Debris Area. Incremental funding in the amount of $250,000 was obligated during the 4th quarter of fiscal year of 2000. It has been determined that this extension is necessary and reasonable for support of this action and currently no additional funds are necessary.

The period of performance should be extended from December 31, 2001 to December 31, 2002, to allow for the full completion and evaluation of all data collection.

The Remedial Project Manager has reviewed the time requirements and has found it to be reasonable and necessary for the work being performed.

Allocation Methodology:

Goal 05 - Better Waste Management, Restoration of Contaminated Wastes, and Emergency Response

Objective 01 - Reduce or control risks to human health

Subobjective 02 - Respond to Superfund Hazardous Waste Sites

Program Results Code: 50102D - 100% - Amount $ 0

Recommendation:

The extension to the period of performance is necessary and reasonable for the work planned. Therefore, I recommend that the period of performance be extended to December 31, 2002 for the completion of the supplemental ground water investigation of the residents living east and southeast of the Himco Dump Superfund Site.

Attachments

cc: Gloria Willis, Project Officer, SM-5J
Gwendolyn Massenburg, Remedial Project Manager, SR-6J